



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

**AUG 16 2013**

Noel Ludwig, Project Manager  
California Desert District Office, BLM  
22835 Calle San Juan De Los Lagos  
Moreno Valley, California 92553

Subject: Final Environmental Impact Statement for the Ocotillo Sol Solar Project and Draft California Desert Conservation Area Plan Amendment, Imperial County, California (CEQ# 20130222)

Dear Mr. Ludwig:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Ocotillo Sol Solar Project and Draft California Desert Conservation Area Plan Amendment pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Bureau of Land Management on July 19, 2012. We rated the DEIS as *Lack of Objections* (LO), but recommended that certain information be added or clarified in the Final EIS.

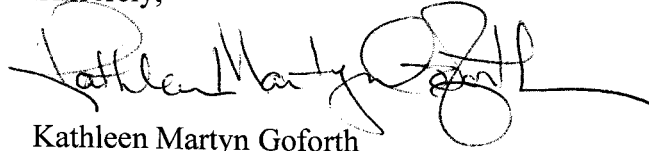
We appreciate the efforts of the BLM, San Diego Gas and Electric, and its consultants to respond to our DEIS comments, and we commend the applicant and BLM for developing additional mitigations, such as a weed management plan, ethnographic study, and an increase in archeological site testing and evaluation, that support an environmentally preferable outcome.

We note that the FEIS did not address our comment regarding cumulative impacts to air quality, nor did the Response to Comments section explain the basis for the limited geographic scope used for the analysis. Determination of the affected environment should be based on perception of meaningful impacts for each resource at issue, rather than on a predetermined geographic area. The EPA disagrees with the FEIS' assertion that there is never overlap of air quality impacts for sources separated by six miles. The degree of overlap would depend on the emissions, size of the source, and release height, among other criteria. For example, in our air permitting process, we require modeling of the significant impact area plus 50 kilometers out.

We recommend that the Record of Decision include a more extensive discussion of cumulative air impacts, and specify the parameters of the analysis and the reasons for the establishment of those parameters. If the project would affect the ability of other foreseeable projects to be permitted, the ROD should discuss this and include commitments to ensure that all feasible measures to reduce and mitigate air quality impacts to the greatest extent possible will be implemented.

We appreciate the opportunity to review the FEIS for the Ocotillo Sol Solar Project. When the ROD is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact Scott Sysum at (415) 972-3742 or [sysum.scott@epa.gov](mailto:sysum.scott@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Martyn Goforth", with a long horizontal flourish extending to the right.

Kathleen Martyn Goforth  
Manager

Environmental Review Office (CED-2)  
Communities and Ecosystems Division